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November 14, 2022

BY ECF

Honorable Cheryl L. Pollak
United States District Court
Eastern District of New York
225 Cadman Plaza East
New York, NY 11201

**RE: *Securities & Exchange Commission v. Abujudeh,*
1:21-cv-04110-PKC-CLP**

Dear Chief Magistrate Judge Pollak:

On September 13, 2022, the Court ordered the Parties to provide a status report by November 14, 2022. Accordingly, the Parties provide the following updated information in response to the Court's order.

As noted in last status report, the Parties in this matter have agreed on the liability issues as stated in the SEC's complaint. Since the last status report, the Parties have made substantial progress negotiating the terms of disgorgement and other relief sought by the Commission. To allow the Parties to conclude these settlement negotiations, and to allow time for the Commission Staff to obtain Commission approval of any proposed resolution, the Parties respectfully request that the case remained stayed and that Court order the Parties to provide a further status report within 60 days. The Parties do not anticipate seeking further extensions.

We are available should the Court have any questions.

Respectfully submitted,

/s/ Russell D. Duncan

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/s/ Nita K. Klunder

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cc: Nita K. Klunder, Counsel for the Securities & Exchange Commission (by email and ECF)